

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Beckham Jewelry, LLC, Debtor

**Case No. 25-01234-JAW
CHAPTER 11**

RESPONSE

COMES NOW, Debtor, by and through counsel, and responds to Creditor, TDLDC Retail I, LLVC's ("Landlord") Motion for Order Rejecting Business Lease (dk # 41) as follows:

1. Debtor commenced this case on May 4, 2025 by filing a voluntary petition for relief under Chapter 11 of Title 11 of the United States Bankruptcy Code.
2. Debtor and Landlord have engaged in constructive, good-faith negotiations aimed at resolving all lease-related issues since the Motion was filed.
3. Those discussions focus on (i) authorizing a short-term, supervised liquidation sale of the store's inventory and (ii) vacating the premises promptly after the sale's conclusion.
4. Debtor believes the material terms of a consensual resolution are within reach and optimistic that an agreement can be presented to the Court by the hearing date.

WHEREFORE, Debtor prays for an Order denying the Motion and for such additional or alternative relief as may be just and proper.

Respectfully submitted,

By: /s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
Attorney for Debtor

Of Counsel:

Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer A Curry Calvillo (MSBN 104367)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
trollins@therollinsfirm.com
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Response was forwarded on June 17, 2025, to:

By USPS First Class Mail:

TDLDC Retail I, LLC
300 Concourse Blvd
Ste 105
Ridgeland, MS 39157

By Electronic CM/ECF Notice:

Robert B. Ireland, III, Attorney for Creditor

Craig M Geno, Trustee

U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

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4 **UNITED STATES BANKRUPTCY COURT**
5 **SOUTHERN DISTRICT OF MISSISSIPPI**

6 IN RE:
7 Beckham Jewelry, LLC

8 CASE NO: 25-01234
9 **DECLARATION OF MAILING**
10 **CERTIFICATE OF SERVICE**
11 Chapter: 11

12 On 6/17/2025, I did cause a copy of the following documents, described below,

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16
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18 Response

19 to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with
20 sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and
21 incorporated as if fully set forth herein.

22 I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.
23 com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to
24 Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if
25 fully set forth herein.

26 Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been
27 served electronically with the documents described herein per the ECF/PACER system.

28 DATED: 6/17/2025

29 /s/ Thomas C. Rollins, Jr.
30 Thomas C. Rollins, Jr.

31 The Rollins Law Firm
32 702 West Pine St
33 Hattiesburg, MS 39401
34 601 500 5533
35 trollins@therollinsfirm.com

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3 **UNITED STATES BANKRUPTCY COURT**
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5 IN RE:
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10 Chapter: 11

11 On 6/17/2025, a copy of the following documents, described below,

12 Response

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19 were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient
20 postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth
herein.

21 The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above
22 referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of
Service and that it is true and correct to the best of my knowledge, information, and belief.

23 DATED: 6/17/2025

24 
25

26 Miles Wood
27 BK Attorney Services, LLC
28 d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

FIRST CLASS

TDLDC RETAIL I, LLC
300 CONCOURSE BLVD
STE 105
RIDGEELAND MS 39157